

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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AFRICAN COMMUNITIES )  
TOGETHER, a membership )  
organization; UNDOCUBLACK )  
NETWORK, a membership )  
organization; DAVID KROMA; )  
MOMOLU BONGAY; OTHELLO )  
A.S.C. DENNIS; YATTA KIAZOLU; )  
CHRISTINA WILSON; JERRYDEAN )  
SIMPSON; C.B., AL. K., D.D., D.K., )  
AI. K., AD. K. by and through their )  
father and next friend DAVID KROMA; )  
O.D., and A.D., by and through their )  
father and next friend OTHELLO )  
A.S.C. DENNIS; O.S. by and through )  
his mother and next friend )  
JERRYDEAN SIMPSON, )

Plaintiffs,

v.

DONALD J. TRUMP, President )  
of the United States in )  
his official capacity; )  
UNITED STATES DEPARTMENT OF )  
HOMELAND SECURITY; )  
KIRSTJEN NIELSEN, )  
Secretary )  
of the Department of )  
Homeland Security in her )  
official capacity, )

Defendants.

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Civil Action No.

**MOTION FOR IVAN ESPINOZA-MADRIGAL TO APPEAR *PRO HAC VICE***

Pursuant to Massachusetts Local Rule 83.5.3(b), the undersigned and member of the bar of this Court, hereby requests that Ivan Espinoza-Madrigal, Executive Director of Lawyers for

Civil Rights (LCR), be permitted to appear as counsel for the Plaintiffs and practice in this Court *pro hac vice*, stating in support thereof as follows:

1. Mr. Espinoza-Madrigal is an experienced litigator who will be of great assistance to Plaintiffs in the litigation of their case.
2. Mr. Espinoza-Madrigal is a member in good standing of the bars of the State of New York, the United States Court of Appeals for the First, Second, Fifth, Sixth, and Ninth Circuits and United States District Courts for the Southern District of New York, the Eastern District of New York, and the Western District of Texas.
3. Attached as Exhibit A is a Certification signed by Mr. Espinoza-Madrigal respectively setting forth the information required under Local Rule 83.5.3.
4. Plaintiffs contacted counsel for the Defendants and they have assented to the relief requested in this motion.

Respectfully submitted,

Dated: March 8, 2019



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Oren N. Nimni (BBO #691821)  
LAWYERS FOR CIVIL RIGHTS  
61 Batterymarch Street 5<sup>th</sup> Floor  
Boston, MA 02110  
Tel: (617) 988-0606  
onimni@lawyersforcivilrights.org

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on March 8, 2019.

Oren Nimni

A handwritten signature in black ink, appearing to read 'Oren Nimni', is written over a horizontal line.

## EXHIBIT A

**UNITED STATES DISTRICT COURT  
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Defendants.

Civil Action No.

**COMPLAINT**

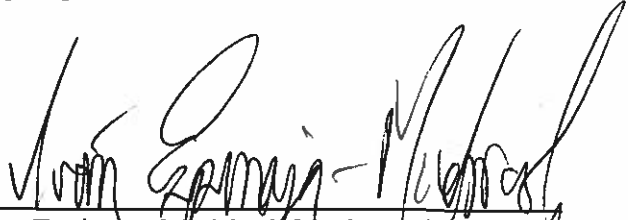
**DECLARATION OF IVAN ESPINOZA-MADRIGAL IN SUPPORT  
OF MOTION FOR ADMISSION *PRO HAC VICE***

I, Ivan Espinoza-Madrigal, make the following declaration in support of the motion for admission *pro hac vice* filed on my behalf:

1. I am Executive Director of Lawyers for Civil Rights, 61 Batterymarch Street, 5<sup>th</sup> Floor, Boston, Massachusetts, MA 02110.
2. I am a member in good standing of the bars of the State of New York, the United States Court of Appeals for the First, Second, Fifth, Sixth, and Ninth Circuits and United States District Courts for the Southern District of New York, the Eastern District of New York, and the Western District of Texas.
3. I am a member of the bar in good standing in every jurisdiction where I have been admitted to practice. There are no disciplinary proceeding pending against me as a member of the bar in any jurisdiction.
4. I have never been denied admission *pro hac vice* in this jurisdiction, nor have I ever had admission *pro hac vice* revoked in this jurisdiction or been subject to disciplinary proceedings in this jurisdiction.
5. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts and agree to comply with them.

I declare under penalty of perjury that the foregoing is true and correct.

Date: March 8, 2019

  
Ivan Espinoza-Madrigal (NYS Bar #4409513)  
LAWYERS FOR CIVIL RIGHTS  
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Boston, MA 02110  
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